

# VIRGIN PLUS PRIVACY POLICY

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# TABLE OF CONTENTS

Virgin Plus Privacy Policy .....	3
Consent and Your Personal Information .....	3
Collection, Use, Disclosure and Your Personal Information .....	4
Correcting and Safeguarding Your Personal Information .....	5
Changes, Questions and Contact Information .....	6

# WELCOME TO THE VIRGIN PLUS CANADA PRIVACY POLICY.

This is important information, so we recommend taking the time to read through the details so you can get up to speed. It's actually kinda interesting!

We (our Companies<sup>1</sup>) are committed to maintaining the privacy of your Personal Information. This includes keeping our Privacy Policy updated so you are fully informed. Check back from time to time to see what's new.

**"Personal Information"** is information about you as an identifiable individual that is protected by law. We use this term throughout this Privacy Policy to help explain:

- how and why we collect, use, and sometimes disclose your Personal Information;
- how and when your informed consent will be requested (along with certain exceptions);
- how you can access your Personal Information; and
- how to contact us if you have questions or concerns about your privacy.

This Privacy Policy applies to Personal Information that we collect, use or disclose when providing you with our products and services. This could include information like your name, mailing address, email address, phone number, credit card numbers, how you use your devices and billing records. Sometimes, when information such as your name, address and telephone number are available publicly (such as in a directory listing) that information wouldn't be considered protected Personal Information.

We built this Privacy Policy based on the foundation of our Commitment to Privacy to inform you about how your Personal Information is treated when using our products and services. Supplemental information may also be provided relating to specific products and services as required, such as our Mobile App Privacy Notice (available in our mobile apps), our Website Terms of Use, your Terms of Service for our wireless and wireline products and services, and frequently asked questions on our website.

## CONSENT AND YOUR PERSONAL INFORMATION:

### 1. Do the Companies need my consent to collect, use or disclose my Personal Information?

Subject to certain limited exceptions, yes. When you use our products or services, your consent will be implied. In certain circumstances, we may also seek your express consent to our collection, use or disclosure of your Personal Information. For example if your Personal Information is highly sensitive and required for a new purpose we may ask for your express consent (either verbally, by checking a box, signing an agreement or taking another affirmative action). If your Personal Information isn't necessarily required to provide the product or service, you may also be able to withdraw your consent. For example, you can opt-out of a variety of marketing communications by us, including commercial electronic messages like emails and SMS messages either through your My Account profile or online at [virginplus.ca/communicationpreferences](http://virginplus.ca/communicationpreferences). If your Personal Information is necessary to provide you with the products or services you requested or the safety and security of our network, then

<sup>1</sup> In this Privacy Policy, the words "we", "us", "our" and "Companies" refer to the Bell family of companies and brands as they exist over time, as well as any successor companies as a result of corporate reorganizations or restructurings, including: AAA Alarm Systems Ltd., Alarm Force Industries Inc. (Bell Smart Home, Bell Business Security & Automation), Axia, Bell Aliant, Bell Canada, Bell ExpressVu LP (Bell TV), Bell Media, Bell Mobility, Bell MTS, Cablevision du Nord, DMTS, Epic Communications, KMTS, Lucky Mobile, Maskatel, NorthernTel, Northwestel Inc., Ontera, Solo Mobile, Telebec, The Source and Virgin Plus. All of our Companies adhere to the commitments found in this Privacy Policy, unless otherwise indicated by a separate privacy policy.

there is no ability to opt-out because it is a condition of service. In these circumstances, the only option is to terminate your relationship with us.

The law also permits certain exceptions to obtaining consent, including:

- if it is clearly in your interests (like a medical emergency or a threat to your safety);
- to comply with a warrant or other court order;
- to collect monies owed;
- to investigate the breach of an agreement or applicable law (like piracy in breach of the Copyright Act);
- to detect, suppress or prevent fraud and secure our networks; or
- as otherwise legally required or allowed.

If appropriate or necessary, we may rely on one of these exceptions.

## **2. Do the Companies use de-identified Personal Information?**

Yes, we use de-identified information to improve our operations, products, services and available offers, to provide social benefits, and to develop analytic marketing reports. De-identified information may also be combined with statistical data, including data provided by government agencies and third-party data aggregators to better inform us.

**If you're wondering about the ins and outs of our Privacy Policy...**

# **COLLECTION, USE, DISCLOSURE AND YOUR PERSONAL INFORMATION:**

## **3. When do the Companies collect my Personal Information?**

We collect your Personal Information through various ways. For example:

- during the inquiry, activation or purchase process for a product or service (including through our dealers, retailers and other service representatives);
- when we provide service to our customers, including technical support or during the warranty, repair claims and service process;
- when you use our products or services, visit one of our websites, use our apps, or call into a call centre;
- from third-parties, like credit reporting agencies, or other third-parties with whom you have had a payment relationship.

## **4. How do the Companies use my Personal Information?**

We use your Personal Information, including sharing information between our Companies so that we may:

- provide you with our products and services (including through third-party suppliers);
- better understand your needs and preferences;

- maintain responsible commercial relations with you;
- determine your eligibility for products and services and recommend products and services to you;
- develop and enhance our products and services;
- market products and services that may be of interest to you;
- manage our business operations;
- detect, suppress or prevent fraud and manage and secure our networks;
- meet our legal and regulatory obligations.

We use market leading data analytics technologies to help us inform and improve the uses described above.

## **5. When is my Personal Information disclosed?**

We may disclose your Personal Information with your consent, or when it is permitted or required by law, including;

- to an authorized account holder for household accounts or accounts with multiple devices, or a person acting as your agent (like a legal representative or authorized user);
- to another communications service provider or a telephone directory service provider in order to offer efficient and effective communications services (for example, to provide roaming services when you roam in another carrier's coverage area);
- to third-party collection agencies for the purpose of collecting amounts owed to us which are past due;
- to third-parties, like credit reporting agencies or other companies you have had a payment relationship with, to assess creditworthiness;
- to delivery organizations to ship you products and/or services you have ordered;
- to a government institution or another organization if reasonably necessary to establish your identity, or to investigate the contravention of a law or an agreement, or to detect, prevent or suppress fraud and secure our networks;
- to an appropriate public authority in an emergency situation where there is imminent danger to life or property;
- if you have already given your consent to us or a third-party (such as a smart home device provider, financial institution, insurance company, social media network, or other online site);
- as otherwise allowed or required by law.

## **CORRECTING AND SAFEGUARDING YOUR PERSONAL INFORMATION:**

### **6. How do I review and correct my Personal Information?**

Just ask us by getting in touch with the Virgin Plus Privacy Office (see Section 11 for contact

information). You can review the Personal Information in your file, subject to certain restrictions and exceptions (a reasonable fee may apply), within a reasonable time after receiving a request in writing from you. If we cannot provide you with access to your Personal Information (for example, if it would involve revealing someone else's Personal Information or other confidential or privileged information), we will let you know why. Our goal is to keep the Personal Information we hold about you accurate, up-to-date and complete. If you find a mistake, let us know and we will correct it.

## **7. How is my Personal Information protected?**

We use appropriate security safeguards which vary depending on the sensitivity of the Personal Information. All of our employees with access to Personal Information receive ongoing training with respect to the confidentiality of Personal Information. Personal Information we disclose to third-parties, including our suppliers and agents acting on our behalf, is protected through our contracts with them. Because the security of your Personal Information in this digital age cannot be 100% guaranteed, you can also help protect your own Personal Information by adopting smart security practices, like never re-using passwords across accounts or websites, changing passwords regularly and choosing passwords that are hard to guess.

## **8. Will my Personal Information ever be transferred, stored or processed outside of Canada?**

Yes, sometimes your Personal Information is provided to our suppliers and agents who operate outside of Canada, in accordance with safeguards that meet Canadian standards. For Personal Information processed outside of Canada, we have strict processes and policies regarding how your Personal Information is used. However, your Personal Information may be subject to the laws of other countries.

## **9. How long is my Personal Information kept?**

Only as long as it is reasonably needed or relevant for the identified purposes (see Section 4), or as required by law. We may keep certain Personal Information for an extended period of time even when you are no longer our customer (like for required tax and financial record keeping, security, fraud prevention, and to manage business operations). Once Personal Information is no longer reasonably necessary, or relevant for the identified purposes, or required by law to be retained, your Personal Information is destroyed, erased or de-identified.

**If you have questions, we're ready for them.**

## **CHANGES, QUESTIONS AND CONTACT INFORMATION:**

### **10. Can this Privacy Policy change?**

Yes, it can. We will post the change on our website, and we will also make reasonable attempts to notify you by including a notice in your bill, sending you an email or a text message, or other means.

### **11. Questions or concerns about our privacy practices?**

The security and privacy of your Personal Information is important. We have a dedicated section on our website relating to privacy ([virginplus.ca/privacy](http://virginplus.ca/privacy)) where you can find frequently asked questions relevant to the protection of your Personal Information. For additional questions, you

can send an email to [privacy@virginplus.ca](mailto:privacy@virginplus.ca), or you can also contact us as follows:

The Office of the Virgin Plus Canada Privacy Ombudsman  
160 Elgin Street  
Ottawa, Ontario K2P 2C4

We investigate all privacy complaints and take appropriate steps to resolve them, including changing our practices where required.

## **12. What if I still have concerns after contacting the Virgin Plus Privacy Office?**

If we do not answer your concern to your satisfaction, you can contact:

Office of the Privacy Commissioner of Canada  
30 Victoria Street  
Gatineau, Quebec  
K1A 1H3  
Toll-free: 1-800-282-1376